



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 155
Seattle, WA 98101-3188

REGIONAL
ADMINISTRATOR'S
DIVISION

November 15, 2021

Joshua White, Ranger
Three Rivers District
255 West 11th Avenue
Kettle Falls, Washington 99141

Dear Joshua White:

The U. S. Environmental Protection Agency has reviewed the U.S. Forest Service's notice to prepare an Environmental Assessment for the Stimson Land Exchange Project for lands in the Newport and Three Rivers Ranger Districts near Chewelah, Washington (EPA Region 10 Project Number 21-0057-USFS). EPA conducted the review in accordance with our responsibilities under the National Environmental Policy Act, the Council of Environmental Quality regulations (40 CFR §§ 1500-1508), and Section 309 of the Clean Air Act.

According to the notice, USFS proposes to evaluate the potential environmental impacts associated with a land exchange between the Colville National Forest and the Stimson Lumber Company. USFS would acquire approximately 60,000 acres of land currently managed by the Stimson Lumber Company in exchange for approximately 30,000 acres of land currently managed by the Colville National Forest. Actions associated with the land exchange include removing approximately 150 miles of road from the USFS road system and adding approximately 530 miles of road to the USFS road system. Status of acquired roads will be analyzed to determine if they should be open, closed, or decommissioned.

EPA supports the overall purpose of the proposed action to consolidate landownership in order to improve management of natural resources, cultural resources, and fire preparation. We recommend that the EA include the environmental effects of the proposed project on natural resources and any necessary mitigation measures to reduce or offset those effects. Information on the following topics will be particularly helpful to provide to decision makers and the public:

- Roads and sedimentation: it appears that the majority of environmental impacts will result from road management activities. We therefore recommend that the EA:
 - Include a description of how roads in the watershed currently impact resources and describe the change in road miles and density that will occur because of this action;
 - Describe the enforcement measures and the monitoring program that USFS will implement to ensure road closures, if any, are effective;
 - Explain how USFS will decommission/stabilize roads to ensure soil stability; and
 - Disclose how USFS will work with the Stimson Lumber Company to ensure former-USFS roads are maintained or decommissioned to minimize harm to the environment.
- Water quality: disclose potential impacts to water quality as a result of road management activities. We specifically recommend that the EA:
 - Identify water bodies likely to be impacted by the project, the nature of the potential impacts, and the specific discharges and pollutants likely to impact those waters;

- Disclose information regarding relevant Total Maximum Daily Load allocations for any impaired waters listed on the latest state Clean Water Act 303(d) list or Integrated Report, along with the water quality standards and pollutants of concern; and
- Demonstrate that the proposed action will prevent the deterioration of any water bodies that currently meet state water quality standards, consistent with anti-degradation standards.
- Air quality: we recommend providing a detailed discussion of ambient air conditions (baseline or existing conditions), National Ambient Air Quality Standards, criteria pollutant nonattainment and maintenance areas, and potential air quality impacts of the proposed action (including reasonably certain long-term and secondary effects).
- Species protection: we recommend working with the U.S. Fish and Wildlife Service and the Washington Department of Fish and Wildlife to determine potential impacts of the project on plant and wildlife species, especially species classified as rare, threatened, or endangered on either state or federal lists.
- Tribal Consultation: we recommend describing the process and outcome of any government-to-government consultation between the Forest Service and the Tribal governments with tribally protected treaty rights in the project area, issues that were raised (if any), and how those issues were addressed.
- Environmental Justice (EJ): we recommend disclosing what efforts were taken to ensure meaningful public participation during the development of the impact analysis. In addition, if communities with EJ concerns will be impacted by the proposed project, the EA will need to disclose what efforts were taken to meet the federal government EJ requirements consistent with Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority and Low-Income Populations*.¹ One tool available to use in assessing environmental justice impacts is the EPA's Environmental Justice Screening and Mapping Tool (EJSCREEN).² Additional EJ mapping resources are available through the Washington Department of Health's Environmental Health Disparities Tool.³
- Mitigation: we recommend identifying and describing appropriate mitigation measures to minimize environmental impacts associated with the project, specifying which ones would be committed to by the Forest Service or another federal, state, or local agency.

Thank you for the opportunity to provide comments. If you would like to discuss these comments, please contact Caitlin Roesler at 206-553-6518 or roesler.caitlin@epa.gov, or me at 206-553-1774 or at chu.rebecca@epa.gov.

Sincerely,

Rebecca Chu, Chief
Policy and Environmental Review Branch

¹ <https://www.archives.gov/files/federal-register/executive-orders/pdf/12898.pdf>

² <https://www.epa.gov/ejscreen>

³ <https://fortress.wa.gov/doh/wtn/WTNIBL/>